



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JPL/FJN  
F. #2014R01920

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 24, 2022

By E-mail

Erica T. Vest  
U.S. Probation Officer  
Eastern District of New York  
147 Pierrepont Street  
Brooklyn, New York 11201

Re: United States v. Yony Alberto Grajales Alvarez  
Criminal Docket No. 14-625 (S-3) (DLI)

Dear Officer Vest:

The government writes in response to the defendant Yony Alberto Grajales Alvarez's August 10, 2022 objections to the Presentence Investigation Report in the above-referenced case (the "PSR"). See Dkt. No. 170.

As to the defendant's objections to paragraphs 2 through 34, the government does not dispute that the defendant did not participate in these violations or that the defendant joined the Urabeños in late 2013, after the vast majority of these violations had already occurred. Nevertheless, because these paragraphs accurately describe the violations as alleged against multiple defendants charged in the third superseding indictment, the government submits that they need not be deleted from the PSR.

As to the defendant's objection to paragraph 44, the government understands this objection to refer to the first of two attempted collections in 2013 described in this paragraph; the attempted collection of \$11 million. While the government agrees that the debt was not owed to the Urabeños, the government writes to clarify that the assistance and permission of the Urabeños was sought because the collection was to occur within Urabeños-controlled territory.

The government has no further objections to the PSR, and reserves it right to reply to any of the defendant's responses to the government's prior objections.

The defendant is currently scheduled to be sentenced on October 19, 2022 at 11:00 a.m. Please do not hesitate to contact us if you have any questions.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/  
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cc: Clerk of Court (DLI) (by ECF and hand)  
Sally M. Butler, Esq. (by ECF and e-mail)